

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MONROE COUNTY EMPLOYEES'
RETIREMENT SYSTEM, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ASTRAZENECA PLC, PASCAL SORIOT, MARC
DUNOYER, and MENELAS PANGALOS,

Defendants.

VLADIMIR ZHUKOV, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

v.

ASTRAZENECA PLC, PASCAL SORIOT, MARC
DUNOYER, and MENELAS PANGALOS,

Defendants.

Case No. 1:21-cv-00722-JPO

CLASS ACTION

Honorable J. Paul Oetken

Case No. 1:21-cv-00825-JPO

**NOTICE OF MOTION AND MOTION FOR CONSOLIDATION OF RELATED
ACTIONS, APPOINTMENT OF VINOD ALLURI AS LEAD PLAINTIFF,
AND APPROVAL OF SELECTION OF LEAD COUNSEL**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that on a date and at a time designated by the Court, or by some other means chosen by the Court, in Courtroom 706 of the Thurgood Marshall Building and United States Courthouse, 40 Foley Square, New York, NY 10007 before the Honorable J. Paul Oetken, or any Judge sitting in his stead, movant Vinod Alluri ("Movant") will and hereby does move this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 ("PSLRA") and

Federal Rule Civil Procedure (“Rule”) 42(a) for an Order: (1) consolidating the above-captioned related securities class actions; (2) appointing Movant as Lead Plaintiff on behalf of a Class consisting of all persons and entities who purchased or otherwise acquired the securities of AstraZeneca plc between May 21, 2020 and November 20, 2020, both dates inclusive; and (3) approving Movant’s selection of Roche Freedman LLP (“Roche Freedman”) as Lead Counsel for the Class.

This Motion is based on this Notice of Motion, the Memorandum of Law in Support Thereof, the Declaration of Constantine P. Economides filed herewith, and all exhibits attached thereto, and such other written and oral arguments as may be permitted by the Court.

This Motion is made on the grounds that consolidation is appropriate under Rule 42 because the above-captioned actions involve common legal and factual questions. In addition, Movant has timely filed its motion pursuant to the PSLRA and is believed to be the investor with the largest financial interest in the outcome of the litigation; and Movant meets the requirements of the PSLRA and Rule 23 in that its claims are typical of the claims of the class, and it will fairly and adequately represent the interests of the class. Further, Movant’s choice of counsel should be accepted by this Court because Roche Freedman is a firm with extensive experience and expertise in securities fraud and other class actions.

For all of the foregoing reasons, Movant respectfully requests that this Court: (1) consolidate the above-captioned related actions; (2) appoint Movant to serve as Lead Plaintiff; (3) approve Movant’s selection of Roche Freedman as Lead Counsel for the Class; and (4) grant such other and further relief as the Court may deem just and proper.

DATED: March 29, 2021

Respectfully Submitted,

ROCHE FREEDMAN LLP

/s/ Constantine P. Economides

Constantine P. Economides
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Proposed Lead Counsel for the Class*

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*Additional Counsel for Lead Plaintiff Movant Vinod
Alluri*

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on March 29, 2021, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel of record.

/s/ Constantine P. Economides

Constantine P. Economides